### **EXPLANATION OF SIGNIFICANT DIFFERENCES**

#### Proposed Central Los Angeles High School #2 Removal Action Workplan

<u>Project Location:</u> Southeast corner of Washington Boulevard and Vermont Avenue,

Los Angeles, Los Angeles County

<u>Lead Agency:</u> Department of Toxic Substances Control

<u>Support Agency:</u> Los Angeles Unified School District

#### Summary of Site History, Contamination, Selected Remedy:

The Los Angeles Unified School District (LAUSD), Proposed Central Los Angeles High School #2 (site) is approximately 14.6 acres. The site was historically occupied by several commercial, light industrial, retail facilities, a service station, an auto sales facility, and residential properties. The Preliminary Environmental Assessment (PEA) conducted in 2001 found elevated levels of lead, cadmium, arsenic, and chromium in soil at multiple locations of the site. A Removal Action Workplan (RAW) was prepared by URS Corporation, dated Nov. 20, 2001, and revised April 9, 2002. The RAW provides the cleanup procedures at the site for the excavation, removal, and off-site disposal of contaminated soils. DTSC approved the RAW April 16, 2002. Implementation of the RAW was delayed due to relocation of site occupants and onsite structure demolition. The soil removal action was implemented between Dec. 15, 2003 and June 16, 2004. Field activities were conducted after the site parcels were acquired by the LAUSD and cleared of pre-existing structures.

# <u>Description of Significant Differences and the Basis for those Differences:</u>

#### Lead-Based Paint Assessment

The original RAW proposed the removal of approximately 1,503 cubic yards of soil. During the removal and the lead-based paint survey, additional contamination was identified. Elevated lead from lead-based paint was identified in the former residential area central, former residential area south, and former residential area east. Waste profile samples were collected and analyzed, and the contaminated soil was disposed offsite. Confirmation samples were collected to confirm the cleanup goals were achieved.

Approximately 931 cubic yards (1,397 tons) of hazardous soil were removed and transported off-site for disposal at Chemical Waste Management in Kettleman City.

#### Former Studio/Mill Area

During the soil removal at Area SS-A117 and concurrent lead-based paint sampling, an area of shallow lead contaminated soil apparently derived from paint waste was identified. Waste profile samples were collected and analyzed, and the contaminated soil was disposed offsite. Confirmation samples were collected to confirm the cleanup goals were achieved.

Approximately 2,717 cubic yards (4,075 tons) of hazardous soil were removed and transported off-site for disposal at Chemical Waste Management in Kettleman City.

The total volume of soil removed (5,146 cubic yards) was significantly greater than the predicted volume of 1,503 cubic yards. This Explanation of Significant Differences documents the significant change in removal volume of lead impacted soil due to various areas of the site being impacted with lead-based paint and paint waste. Post removal confirmation sampling results indicate the removal action goals and objectives were achieved.

#### **Original Remedy**

• -Excavation and offsite disposal of 1,498 cubic yards of lead, arsenic, cadmium, and chromium contaminated soils.

### **Modified Remedy**

- Implementation of lead-based paint sampling and analysis.
- -Disposal of 5,146 cubic yards of from the site.

# **Support Agency Comments:** None applicable.

# Affirmation of the Statutory Determination: Considering the new information that has been

Considering the new information that has been developed and the changes that have been made to the selected remedy, DTSC believes that the remedy remains protective of human health and the environment, complies with federal and state requirements that were identified in the RAW as applicable, or relevant and appropriate to this remedial action and is cost-effective. In addition, confirmation samples indicate the DTSC approved cleanup goals have been achieved and the revised remedy is permanent.

### **Public Participation:**

A copy of this Explanation of Significant Differences will be added to the Administrative Record File, which is available for review at the DTSC, Regional Records Office, 1011 N. Grandview Avenue, Glendale, California 91201.

### Contact:

If you have any questions or wish to discuss the project, please contact Joe Sevrean, DTSC, School Property Evaluation and Cleanup Division, (818) 551-2820. Contacts at the LAUSD are Thomas Watson (213) 633-8242. Si desea información en español, comuníquese con Sra. Mary Elaine Valenzuela al (213) 633-8216.